

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNCENSORED AI, INC.,

Plaintiff,

v.

PERPLEXITY AI, INC.; START ENGINE
CROWDFUNDING, INC.;
UNCENSORED.COM; NOFILTERGPT,
INC.; NASTIA CYPERNETICS; SAS;
VENICE AI, INC.; FREEDOMGPT, INC.;
UNCENSORED.AI.IO; AP SOFTWARE,
LTD.; HENRY FORDIN KATU 5; CLINT
NEILSON; CHAT UNCENSORED, INC.;
ERIC VORHEES,

Defendants.

Case No. 8:25-cv-00040-JFB-JMD

**DEFENDANT PERPLEXITY AI, INC.'S
MOTION TO DISMISS**

Pursuant to Federal Rules of Civil Procedure 12(b)(1)–(3), 12(b)(6), 20, and 21—and in accordance with NECivR 7.1—Defendant Perplexity AI, Inc. (“Perplexity”) moves to dismiss Plaintiff’s Amended Complaint, with prejudice. As set forth in more detail in the Brief in Support of Perplexity’s Motion to Dismiss, which has been concurrently filed in accordance with NECivR 7.1(a)(1), the Court should dismiss all claims against Perplexity for the following reasons.

1. This Court lacks personal jurisdiction over Perplexity. *See* FED. R. CIV. P. 12(b)(2).
2. The District of Nebraska is an improper venue for Plaintiff’s claims against Perplexity. *See* FED. R. CIV. P. 12(b)(3).
3. This Court lacks subject matter jurisdiction over Plaintiff’s claims against Perplexity. *See* FED. R. CIV. P. 12(b)(1).
4. The Amended Complaint fails to state a claim against Perplexity. *See* FED. R. CIV. P. 12(b)(6).
5. Perplexity is improperly joined as a defendant. *See* FED. R. CIV. P. 20(a)(2), 21.

Accordingly, Perplexity moves the Court to dismiss all claims asserted against it in Plaintiff's Amended Complaint, with prejudice.

Dated: August 25, 2025

Respectfully submitted,

/s/ Jennifer L. Barry

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CERTIFICATE OF SERVICE

I certify that on August 25, 2025, I caused a copy of this document to be filed with the Clerk of the Court using the CM/ECF system, which caused a copy of the same to be served on all counsel of record.

/s/ Jennifer L. Barry
Jennifer L. Barry